

FLEISCHMAN BONNER & ROCCO  
ATTORNEYS AT LAW LLP

81 MAIN STREET • SUITE 515 • WHITE PLAINS • NEW YORK • 10601  
TEL: 917-583-8966 • FAX: 908-516-2049 • WEB: [WWW.FBRLLP.COM](http://WWW.FBRLLP.COM)

EMAIL: [SDavies@fbrllp.com](mailto:SDavies@fbrllp.com)

July 24, 2023

**Via ECF**

The Honorable Peggy Kuo  
United States Magistrate Judge  
United States District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *Miller, et al. v. Arab Bank, PLC*, No. 18-cv-2192 (HG) (PK)  
*Pam, et al. v. Arab Bank, PLC*, No. 18-cv-4670 (HG) (PK)**

Dear Magistrate Judge Kuo:

We submit this letter on behalf of all parties in the above-referenced actions in response to the Court's January 24, 2023 Order directing the parties to "file a further joint status report by July 24, 2023 reporting on the progress of discovery and raising any issues which need to be addressed." The parties have conferred and offer the following update on Plaintiff-related discovery.

Pam Plaintiffs have completed production of English and Hebrew ESI for 13 out of 35 custodians, and expect to complete production this week for all but two of the remaining custodians—Abraham Bluth and Aryeh Bluth. For those two custodians, counsel expect to be able to produce any additional responsive ESI within the next few weeks. Miller Plaintiffs have completed production of English and Hebrew ESI of 23 custodians and expect to complete production for the remaining 8 custodians by September 30, 2023.

Arab Bank has completed the depositions of 4 of the 5 Pam Plaintiffs and 8 of the 9 Miller Plaintiffs who reside in the United States. The parties have scheduled the first round of depositions for the Israel-resident Plaintiffs, comprising 6 Pam Plaintiffs and 6 Miller Plaintiffs. These depositions will be conducted in person in Tel Aviv, Israel, commencing the week of August 13, 2023.

Pursuant to the Court's April 14, 2023 minute order, on August 14, 2023 the parties will file a joint status report concerning Arab Bank's progress with respect to the Court-ordered April 14, 2023, Document Production Order.

Respectfully submitted,

/s/ Susan M. Davies